

91 RF 5951

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

September 13, 1991

91-RF-5951

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: F. R. Lockhart

ECOLOGY STANDARD OPERATING PROCEDURES - JMK-0611-91

Ref: D. P. Simonson ltr (7371) to J. M. Kersh, Standard Operating Procedures (SOPs),
September 5, 1991

Environmental Protection Agency (EPA) comments on the Ecology Standard Operating Procedures (SOPs) received by EG&G Rocky Flats on September 6, 1991, required that Threatened and Endangered Species Criteria be added to the Standard Operating Procedures. Pursuant to discussions with your staff and the EPA on September 6, 1991, a draft modification of the Ecology SOPs will be submitted to the Rocky Flats Office of the Department of Energy (DOE/RFO) on October 10, 1991.

If any special status species are found, both the U.S. Fish and Wildlife Service (the overall authority) and the Colorado Division of Wildlife will be notified immediately by telephone and in writing. A recovery plan for each sensitive species discovered will be assigned by the U.S. Fish and Wildlife Service or the Colorado Division of Wildlife, as appropriate. This plan will be implemented by DOE/RFO.

The next release of the Ecology Standard Operating Procedures will contain this protocol as a separate Standard Operating Procedure. This Standard Operating Procedure will be used by field crews performing Environmental Evaluations under the Interagency Agreement (IAG). Compliance with the Threatened and Endangered Species Act during performance of other activities at the Rocky Flats Plant is a plant-wide concern. This procedure will contain a current list of both Federal and State sensitive species, an identifying description of each species, and records of any confirmed sightings at or near the Rocky Flats Plant.

Submitted September 6, 1991 were copies of the Threatened and Endangered Species Evaluation, Rocky Flats Plant Site, dated April 4, 1991, prepared by EG&G Environmental Management Department, NEPA Division. This list was prepared in consultation with the U.S. Fish and Wildlife Service, the Colorado Division of Wildlife, and others as stated in the document. In this publication are descriptions of each of sensitive species. New information may alter the list when it is obtained. If new information alters the list, the SOP will be updated as appropriate.

J. M. Kersh, Associate General Manager
Environmental and Waste Management

LEW:plf

Orig. and 1 cc B. M. Nelson, Jr.

ADMIN RECORD

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

A-SW-001700

DIST.	LTR	ENC
RETZKE, J.C.		
URLINGAME, A.H.		
OPP, R.D.		
ROUCHER, D.W.		
AVIS, J.G.		
VERED, J.E.	X	
ERRERA, D.W.		
ERRIS, L.R.		
RAIKOR, F.J.		
RANCIS, G.E.	X	
OODWIN, R.		
IEALY, T.J.		
DEKER, F.H.		
ENS, J.P.		
EELE, P.B.		
ERSH, J.M.	X	
IRBY, W.A.		
IRKEBO, J.A.		
EE, E.M.	X	
IAJESTIC, J.B.		
IAHEWS, T.A.		
IEURRENS, B.E.		
IOGAN, R.V.	X	
ORTH, P.		
ALMER, L.A.		
OTTER, G.L.	X	
IZZUTO, V.M.		
HOADES, J.I.	X	
AEFELL, B.F.		
WANSON, E.R.		
IEBE, J.S.		
ILKINSON, R.B.	X	
ILLIAMS, R.E.		
ILSON, J.M.		
JUNG, E.R.		
INE, J.O.		
REARD, T.C.	X	
AMSON, E.A.	X	
WAGE, P.S.	X	
WAGE, T.E.	X	
WAGE, M.L.	X	
ELWORTH, T.C.	X	
IRRES CONTROL	X	X
AFFIC		

CLASSIFICATION:

ICNI
NCLASSIFIED
ONFIDENTIAL
ECRET

THORIZE CLASSIFIER

SIGNATURE

DATE

REPLY TO

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APPROVALS:

B -

EE -

HS & TYPIST INITIALS

Order of Events

Regarding the Letters among DOE, EG&G and the EPA Concerning Revisions to the Ecology SOPs

- August 30, 1991 EG&G (Larry Woods) received notice from the DOE (Bruce Thatcher) that EPA had notified him with concerns about DOE's responses to EPA's previous comments to the Ecology SOPs. Within this, was concern over how ecology studies at RFP were going to handle Threatened and Endangered Species (T&E).
- August 30, 1991 EG&G received a copy of the letter transmitted to DOE from the EPA. It discussed imposing stipulated penalties if a response to how ecology studies at RFP were going to handle T&E species was not addressed by September 9, 1991.
- August 30, 1991 EG&G (Meredith Brogden and Larry Woods) discussed with DOE (Bruce Thatcher) the issue of T&E species. EG&G provided to DOE a breakdown of what procedures would be conducted if a T&E species were seen at RFP. The T&E law was discussed and it was clarified that the U.S. Fish and Wildlife Service had jurisdiction over the procedures for dealing with T&E species and that ecology studies at RFP were aware and ready to comply with these requirements as necessary.
- September 3, 1991 EG&G (Meredith Brogden and Larry Woods) met with DOE (Bruce Thatcher) to discuss the issue of T&E species. EG&G presented a copy of a T&E species report prepared for RFP through NEPA, April 4, 1991 to Bruce Thatcher. It was agreed that a memo specifying actions to-date by RFP/DOE on T&E species compliance would be written to EPA and CDH. Also forwarded with this memo would be copies of the RFP T&E species report. This memo was to satisfy the September 9, 1991 due date for a response to the EPA.
- September 4, 1991 EG&G (Larry Woods) was asked by DOE to contact the EPA (Bonnie Lavelle) to determine if the memo would be satisfactory. It was suggested that the memo would satisfy EPA's concerns and would serve to meet the September 9, 1991 deadline.
- September 5, 1991 The issue was raised at the previously scheduled EE Technical Working Group Meeting with EG&G, DOE, EPA, and CDH. It was agreed that an additional SOP will be developed to cover how RFP will comply with the T&E species law .
- September 5, 1991 DOE (Bruce Thatcher) contacted EG&G (Larry Woods) to request a date for delivery of a new SOP. October 10, 1991 was set for delivery of a draft SOP to DOE and October 15, 1991 for delivery of a draft SOP to the EPA for their review.

- September 6, 1991 EG&G received the official memorandum from DOE specifying that EG&G shall submit a new SOP addressing T&E species compliance to the DOE by September 6, 1991 in order to submit it to the EPA and CDH on September 9, 1991 as per the August 30, 1991 EPA memo. Requirements specified in this memo were already out-of-date.
- September 6, 1991 DOE sent the memo to the EPA which responded to the EPA's August 30th memo. DOE's memo specified the new delivery dates for a T&E SOP, and information on RFP T&E species actions to-date, and transmitted copies of the RFP T&E species report.
- September 10, 1991 EG&G (Larry Woods) drafted a letter to the DOE responding to the initial memo requesting the deliverable on September 9, 1991. EG&G's memo specifies the agreed upon date of October 10, 1991 for delivery of a draft T&E SOP to DOE.